EPA Comments on the Supplemental Investigation Work as outlined by Fuss & O'Neill, June 17, 2022

Background

The comments provided below were prepared with the intent to clarify the scope of field activities outlined in the June 17, 2022, Supplemental Investigation Work (Workplan) deliverable which was submitted by Fuss & O'Neill.

These comments represent the most current and comprehensive response from EPA regarding the planned effort. (Note: deleted text was stricken-out to show the evolution of our comments.)

Section 2.0, Proposed Supplemental Investigation Activities

1. It is not clear from the Work Plan what PCB analysis method will be used for aqueous samples. We believe Method 1668 is more appropriate as it will provide a more definitive measure of PCB movement. The presence of solvents in the NAPL may enhance the solubility and degradation of PCBs, which could mean that PCBs might not be captured in an Aroclor analysis. Since the stated goals of the study include measuring the mobility potential of PCBs, it is particularly important to be sure we are capturing all PCBs that are present.

   Because of the higher cost associated Method 1668, BASF may analyze just a subset of the water samples using this Method. However, it is important to perform both Methods 8082 and Method 1668 on a subset of samples so that we can compare the results. Furthermore, all the congeners should be reported when Method 1668 is used.

   Similarly, while we recommend analysis of both filtered and unfiltered samples to determine whether PCBs are contained within the water, vs. being attached to fine particulates; at a minimum, unfiltered samples must be used to capture the "worst-case" condition.

   In any event, BASF will need to provide sufficient data (e.g. Method 8082 or 1668 and filtered or unfiltered samples) to support the conceptual site model relative to the migration of PCBs in GW.

   ~~Regarding the method to be used for the analysis of the water samples: Both filtered and unfiltered samples should be collected and analyzed using method 1668 for homologues and/or congeners~~.

2. Regarding the dye testing that will be performed, if break-out is observed on the river side of the sheet pile wall, how will the precise location (x and y coordinates) be confirmed? For example, will dye simply be observed at surface of river or will a camera be placed below the waterline to detect the exact location of break-through on the sheet pile wall?

Section 3.0, Quality Assurance/Quality Control

3. The QA/QC section indicates the inclusion of trip blanks and Matrix Spikes and Matrix Spike Duplicate (MS/MSD) samples. The plan should indicate the number/frequency of each type of QC sample. It should also state each parameter (e.g. we are not sure whether MS/MSD samples will be collected for all aqueous parameters or only VOCs and PCBs).

4. The Field Plan references the approved Fuss & O'Neill Generic QAPP. A full reference should be provided along with the EPA RFA number (i.e. EPA QA Branch tracking number).

Section 4.0, Supplemental Investigation and Remedial Evaluation Report

5. The plan does not include how groundwater/surface water parameters, beyond VOCs and PCBs, will be used in the evaluation of site conditions. Please elaborate further.